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May 17, 2022

**VIA ECF**

The Honorable Christine P. O'Hearn, U.S.D.J.  
United States District Court  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**Re: Chan v. Golden Nugget Atlantic City LLC**  
**Civil Action No. 1:21-cv-17568-CPO-SAK**

Dear Judge O'Hearn,

I represent Defendant, Golden Nugget Atlantic City LLC ("GNAC") in the above referenced matter. Enclosed for Your Honor's consideration is a Stipulation and Order Setting Time by which GNAC may answer, move or otherwise respond to Plaintiff's Amended Complaint. The parties respectfully request that the Stipulation be entered as an Order on the docket.

Thank you for your consideration of this matter.

Respectfully submitted,

*s/ Karen A. Confoy*

Karen A. Confoy

cc: Counsel of Record (via ECF)

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota Nevada  
New Jersey New York North Carolina Pennsylvania South Carolina Texas Virginia Washington

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

WAYNE CHAN,

Plaintiff,

v.

GOLDEN NUGGET ATLANTIC CITY  
LLC,

Defendant.

Case No: 1:21-cv-17568-CPO-SAK

*Filed Electronically*

**STIPULATION AND ORDER SETTING TIME BY WHICH DEFENDANT MAY  
ANSWER, MOVE OR OTHERWISE RESPOND TO AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Wayne Chan (“Plaintiff”), by and through counsel, Genova Burns, LLC, and Defendant Golden Nugget Atlantic City LLC (“Defendant”), by and through counsel Fox Rothschild LLP, that the time within which Defendant may answer, move or otherwise respond to Plaintiff’s Complaint [ECF No. 1] runs through and includes May 25, 2022, and it is represented that:

1. Defendant received via regular mail a copy of a summons and the Amended Complaint on April 13, 2022;

2. Although Defendant did not concede proper service, on May 3, 2022, Defendant filed an application for an extension of time to answer, move or otherwise reply to the Amended Complaint, pursuant to Local Civil Rule 6.1(b), reserving all rights and defenses, including under Federal Rule of Civil Procedure 12 as to the sufficiency of service and jurisdiction;

3. On May 4, 2022, the Clerk entered the Order on Defendant’s Local Civil Rule 6.1(b) application extending Defendant’s time to answer, move, or otherwise reply to the Amended Complaint by May 18, 2022;

4. On May 4, 2022, CT Corporation, agent for Defendant, received a copy of a summons and the Amended Complaint;

5. On May 10, 2022, Plaintiff filed a proof of service [ECF No. 11] stating service of the Amended Complaint was made on May 4, 2022;

6. The time within which Defendant may answer, move or otherwise reply to the Amended Complaint pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i) based on the filed proof of service, without waiver of any rights or defenses of Defendant, is May 25, 2022.

Dated: May 17, 2022

/s/ Charles J. Messina  
Charles J. Messina, Esq.  
Maria R. Fruci, Esq.  
Michael Mondelli III, Esq.  
**GENOVA BURNS LLC**  
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*Attorneys for Defendant*

**ORDER**

The above stipulation is ORDERED GRANTED. The deadline by which Defendant Golden Nugget Atlantic City LLC may answer, move, or otherwise reply to the Amended Complaint is May 25, 2022.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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Honorable Christine P. O'Hearn  
United States District Judge